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March 14, 2022

Hon. Katherine Polk Failla
United States District Court
U.S. Courthouse
40 Foley Square
New York, New York 10007

MEMO ENDORSED

**Re: United States v. Kwame Garnett, et al
S2 21 Cr. 414 (KPF)**

Dear Judge Failla:

I am the assigned CJA counsel for defendant Kwame Garnett. I write today to respectfully request authorization for the expenditure of CJA funds to retain the services of Clara S. Kalhous, Esq. as associate counsel to assist me in defending Mr. Garnett.

Mr. Garnett is the lead defendant in this case who, according to the government at the recent bail hearing, was involved in some 39 drug transactions with law enforcement dating back to June 2019. According to the government the discovery in this case will involve video and audio recordings, DEA and/or NYPD police and laboratory reports pertaining to these events. Additionally, Mr. Garnett is charged with two weapon counts, an 18 U.S.C. §924 (C) and an 18 U.S.C. §922(g) relating to a pistol and ammunition allegedly seized pursuant to a search of Mr. Garnett's residence at the time of his arrest.

As the Court is by now aware Ms. Kalhous has assisted several S.D.N.Y. counsels, including me, in the past as an associate counsel. Ms. Kalhous ably assisted me before Your Honor in the case of United States v. Martin Mateo, 17 Cr. 449 (KPF). Just this past October Ms. Kalhous served as associate counsel to me in a trial before Judge Preska (United States v. Adelekan, 19 Cr. 291 (LAP)) and her assistance was first rate. Moreover, Your Honor graciously appointed Ms. Kalhous recently in the case of United States v. Drilon Haxhaj, et al (21 Cr. 17) that is pending before Your Honor.

Ms. Kalhous is experienced and adept at reviewing digital discovery, preparing legal memoranda and preparing for and assisting at trial should one occur. She would be an invaluable addition to Mr. Garnett's defense.

Accordingly, should Your Honor be inclined to grant this application it is respectfully requested that Ms. Kalhous be approved at the rate of \$110.00 per hour for an initial period of 50

hours with leave to request additional funding should the need arise. Of course, every effort will be made to avoid duplication of the work load.

Thank you for your consideration to this request and continued courtesies to counsel.

Respectfully submitted,



Richard H. Rosenberg

cc.: Clara Kalhous, Esq.

Application GRANTED.

Ms. Kalhous is directed to file a notice of appearance promptly.

The Clerk of Court is directed to terminate the motion at docket entry 62.

Dated: March 15, 2022
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE